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Attorneys for Defendant Vigorous Shipping & Trading, S.A.

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

PACIFIC GULF SHIPPING CO.,

No. 3:18-cv-02076-MO

Plaintiff,

v.

**DEFENDANT VIGOROUS SHIPPING &
TRADING, S.A.'S PROPOSED CASE
MANAGEMENT SCHEDULE**

ADAMASTOS SHIPPING & TRADING
S.A., VIGOROUS SHIPPING & TRADING,
S.A., BLUE WALL SHIPPING LTD., and
PHOENIX SHIPPING & TRADING S.A.,

Defendants.

Further to the Court's instructions at the conclusion of the January 23, 2019, hearing in the above-captioned matter, defendant Vigorous Shipping & Trading, S.A. ("Vigorous Shipping"), subject to its restricted appearance under Supplemental Admiralty Rule E(8) as owner of the M/V VIGOROUS, respectfully submits the following proposed expedited case management schedule. The parties conferred but were unable to agree on a joint schedule to propose to the Court.

Vigorous Shipping believes bifurcating certain issues in this case will shorten its resolution and expects to file a motion to bifurcate very shortly. Without prejudice to that position., Vigorous Shipping proposes the following schedule:

Answer to Amended Complaint	February 15, 2019
ADR Conference	As scheduled by Judge Papak
Initial Conference for Discovery Planning	By February 15, 2019
Joinder of Any Additional Parties and Amendment of Pleadings	February 15, 2019
Completion of Discovery	April 19, 2019
Dispositive Motions	April 26, 2019
Joint Proposed Pretrial Order	May 20, 2019
Pretrial Memoranda	May 31, 2019

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Final Pretrial Conference	As set by the Court
Bench Trial (4 Days)	First half of June, 2019

DATED: January 25, 2019.

MILLER NASH GRAHAM & DUNN LLP

s/ Sanja Muranovic

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